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June 4, 2019

VIA E-COURTS

Honorable Steven C. Mannion, U.S.M.J.
United States District Court - Newark Vicinage
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Steven Prunkel v. County of Bergen, et al.
Case No.: 17-CV-05154-JJL-SCM

ES

Dear Judge Mannion:

I represent plaintiff, Steven Prunkel. I write to respectfully request an extension of the dates for expert disclosures and dispositive motions in this case.

The reason for this request is that Plaintiff's police procedures expert, Ronald Traenkle, who was identified to all counsel by letter dated February 20, 2019, has just recently informed me that he must withdraw as Plaintiff's expert in this case due to a recent and ongoing medical condition.

Within the last few days, Plaintiff has retained a new expert, Joseph J. Blaettler, AAS, BS, MS, CPM, of East Coast Private Investigations of New Jersey, LLC as his new expert. I anticipate Plaintiff providing full expert disclosures before August 15, 2019.

I make the request also based on the fact that the subpoena to Star Candle seeking access to that company's computer system is still pending. Plaintiff's experts expect to refer to the results of any search of Star Candle's computer system in their reports.

I have respectfully proposed the following schedule for the remainder of discovery:

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- Plaintiff's affirmative expert disclosures - August 15, 2019;
- Defendants' responsive expert disclosures - September 30, 2019;
- Dispositive motions to be filed - November 15, 2019.

Counsel for the defendants have consented to this request and the proposed schedule.

Your Honor's consideration is greatly appreciated.

Respectfully yours,

/s/ David T. Shivas

David T. Shivas

cc: DAG Matthew Skolnik, Esq.
Harry S. Norton, Esq.

SO ORDERED

s/Steven C. Mannion

Steven C. Mannion, U.S.M.J.

Date:

6/6/19